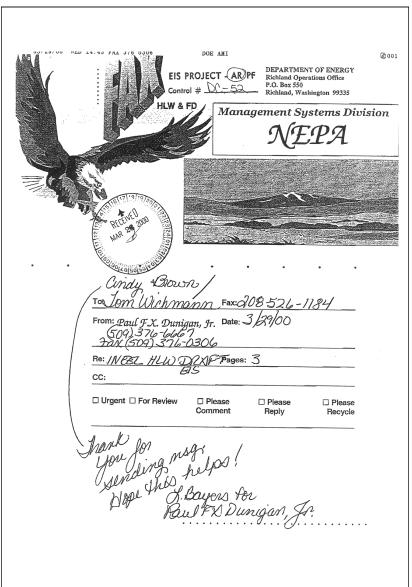
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HANFORD ADVISORY BOARD

March 7, 2000 US Dent of Energy US Environmental Protection Agency

Mr. Thomas L. Wichmann Document Manager U.S. DOE, Idaho Operations Office

850 Energy Drive; Mail Stop 1108 Idaho Falls, ID 83401-1563

Subject: INEEL High-Level Waste Draft EIS

BOARD MEMBERS:

Dear Mr. Wichmann:

Some members of the Hanford Advisory Board (HAB) attended the February 3 presentation conducted by staff of the U.S. Department of Energy on the Idaho High-Level Waste and Facilities Disposition Draft Environmental Impact Statement (EIS). On behalf of the HAB, we are submitting the following statement to be considered by DOE.

The HAB is not prepared at this time to provide specific comments on the EIS. The Hanford vitrification plant has not been constructed and thus will not be available for several years. In addition, when it becomes operational, it will take many years to vitrify Hanford tank wastes. Thus, it would be premature at this time for us to comment on the EIS alternative that would send INEEL high-level wastes to Hanford for vitrification.

However, three consistent positions of our Board relate to the issue.

In Advice #13 and subsequent pieces of advice, we have stated that if another site sends waste to Hanford for treatment, it should not be sent until a treatment facility is || E(z) built and operating. Once treated, the waste must be returned to the sending site.

We cannot support Idaho's waste coming to Hanford until all of Hanford's high-level waste has been treated. We emphasized in our recent statement on tank wastes that 11.E(5) the Hanford tanks are one of the most urgent environmental threats to the country. We have three types of tanks: those that have leaked, those that will leak, and those that will leak again. The single-shell tanks are already beyond their design life and the double-shell tanks will reach that point before the vitrification process is completed. Vitrification of these wastes must proceed expeditiously and be completed before a major accident occurs with the aging tanks.

We have indicated in several pieces of advice that if any wastes come to Hanford for treatment or disposition "the sending site should cover all costs." The Hanford II. E(3) budget is not adequate to cover even the costs of our own cleanup efforts in

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EIS PROJECT (AR)PF

Control # D -

HLW & FD

RICHLAND **OPERATIONS OFFICE**

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accordance with our Tri-Party Agreement and regulatory requirements. The impact of offsite wastes on the inadequate budget of Hanford and the environmental impacts of any diversion of Hanford cleanup funds must be factored into decisions on offsite wastes and should be thoroughly analyzed in this EIS. The Hanford cleanup dollars should not be used to subsidize the receipt, treatment, and/or storage of offsite wastes.]

52-4 VII.A(6) We would appreciate being consulted as this process continues forward, particularly when a preferred alternative or other decisions are being considered which might impact Hanford.

Very truly yours,

Merilyn B Leeve Merilyn B. Reeves, Chair Hanford Advisory Board

cc: Keith Klein, Manager, DOE-RL

Dick French, Manager, DOE-ORP Tom Fitzsimmons, Director, Washington Department of Ecology

Chuck Clarke, Regional Administrator, U.S. Environmental Protection Agency

Wade Ballard, Acting Designated Federal Official

The Oregon and Washington Congressional Delegations

Michael Gearheard, U.S. Environmental Protection Agency

Dan Silver, Washington Department of Ecology

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Appendix D

New Information

	HLW & FD EIS PROJECT (AR)PF
	Control # DC=33
1	THE CHARG DEPARTMENT OF THE CA
2	UNITED STATES DEPARTMENT OF ENERGY
3	IDAHO OPERATIONS OFFICE
4	
5	
6	
7	PUBLIC HEARING
8	
9	
10	DRAFT ENVIRONMENTAL IMPACT STATEMENT
11	
12	IDAHO HIGH-LEVEL WASTE AND FACILITIES DISPOSITION
13	
14	
15	
16	February 24, 2000
17	6:00 p.m.
18	Doubletree Inn
19	Pasco, Washington
20	
21	
22	
23	BRIDGES & ASSOCIATES Certified Shorthand Reporters
24	P. O. Box 223 Pendleton, OR 97801
25	(541) 276-9491 - (800) 358-2345
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